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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re Giga Watt, Inc., a Washington
corporation,

Debtor

Case No. 18-03197-FPC

The Honorable Frederick P. Corbit

**NOTICE OF CH. 7 TRUSTEE'S
MOTION FOR ORDERS
APPROVING SETTLEMENTS
AND OF HEARING THEREON**

Hearing Information

Date: **October 3, 2023**

Time: **2:00 p.m. (Pacific Time)**

Location: [Zoomgov.com](https://zoom.us/j/6692545252) or (669) 254-
5252; Meeting ID: 1606922376 (see
below)

The Trustee has filed the *Ch. 7 Trustee's Motion for Order Approving Settlements*, ECF No. 1007 ("Motion") requesting approval of a settlement ("Trustee Settlement") with Perkins Coie LLP, Lowell Ness (collectively, "Perkins") of Adv. Proc. No. 20-80031. The Motion and supporting papers may be obtained from the Court's clerk. **A Zoom hearing will be held on the Motion on October 3, 2023, 2:00 p.m., PT. Hearing access information is set forth below. If you wish to object to the Motion, you must file an objection in the above-captioned case and serve a copy of the objection on the undersigned counsel by September 25, 2023.** The Court may enter an Order approving the

1 Trustee Settlement without an actual hearing or further notice unless a written
2 objection is timely served and filed.

3 Pursuant to the Trustee Settlement, Perkins will pay the Giga Watt estate \$3
4 million contingent on: (1) a final and nonappealable Order of this Court approving
5 the Trustee Settlement; (2) the withdrawal of Claim No. 70-1 filed by Refael
6 Sofair in this bankruptcy case, the dismissal of Mr. Sofair's putative RICO class
7 action in the U.S. District Court (EDWA) ("District Court"), Case No. 2:18-cv-
8 308-SMJ, and the allowance of Mr. Sofair's Claim No. 70-1 on a general
9 unsecured basis in the amount of \$16,977; (3) the dismissal of two consolidated
10 appeals pending in the District Court, Case No. 2:21-cv-291, of Orders staying
11 and enjoining a putative class action ("Class Action"), Case No. 2:20-cv-464,
12 brought on behalf of WTT token holders against Perkins and affiliates; and (4) a
13 final and nonappealable Order of the District Court approving the settlement
14 ("Class Settlement") of the Class Action pursuant to which Perkins has agreed to
15 pay WTT token holders \$4.5 million, subject to the terms of the Class Settlement.
16 The Class Settlement is contingent on Court approval of the Trustee Settlement. In
17 the Class Settlement, WTT token holders are releasing the Giga Watt estate of all
18 claims that arise from or relate to the facts giving rise to the Class Action.

19 Pursuant to the Trustee Settlement, the Trustee is also proposing to dismiss his
20 claims against Timur Usmanov in exchange for mutual releases.

21 Dated this 28th day of August 2023.

22 POTOMAC LAW GROUP PLLC

By: /s/ Pamela M. Egan

23 Pamela M. Egan (WSBA No. 54736)

24 *Attorneys for Mark D. Waldron, Chapter 7 Trustee*

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ZOOM MEETING ACCESS

Topic: Judge Corbit recurring Zoom Meeting ID and Passcode
Time: This is a recurring meeting Meet anytime

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